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and

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*Attorneys for Defendants,*  
*Walmart Inc. and Jetson Electric Bikes, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH	)	
Individually and as Parent and Legal Guardian	)	
of W.W., K.W., G.W., and L.W., minor children	)	
and MATTHEW WADSWORTH,	)	Case No. 2:23-cv-00118-NDF
	)	
Plaintiffs,	)	<b>DECLARATION OF</b>
	)	<b>JARED B. GIROUX IN</b>
v.	)	<b>SUPPORT OF REPLY TO</b>
	)	<b>MOTION TO EXCLUDE</b>
WALMART INC. and	)	<b>TESTIMONY OF DEREK</b>
JETSON ELECTRIC BIKES, LLC,	)	<b>KING</b>
	)	
Defendants.	)	

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I, Jared B. Giroux, state as follows:

1. I am an attorney at McCoy Leavitt Laskey LLC located in Waukesha, Wisconsin.
2. I am one of the attorneys of record for Defendants, Jetson Electric Bikes, LLC and Walmart Inc., admitted *pro hac vice* on August 24, 2023.
3. Attached as Exhibit 1 are the pertinent portions of Defendant's battery expert Samuel Sudler's deposition taken on November 22, 2024.
4. Attached as Exhibit 2 is a true and correct copy of Green River Sheriff Department's Detective Sergeant Jeff Sheaman's report dated February 1, 2022.
5. Attached as Exhibit 3 are the pertinent portions of Green River Fire Department Assistant Fire Chief Bill Robinson's deposition taken on November 15, 2023.
6. Attached as Exhibit 4 are the pertinent portions of Plaintiffs' fire cause expert Derek King's deposition taken on August 19, 2024.

I declare under penalty of perjury that the foregoing is true and correct.



Executed: December 23, 2024

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Jared B. Giroux